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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 Anthony Williams,

15 Plaintiff,

16 v.

17 Experian Information Solutions, Inc.;
18 National Consumer Telecom &
19 Utilities Exchange, Inc.; Clarity
20 Services, Inc. and Ocwen Loan
21 Servicing, LLC,

22 Defendants.

Case No.: 2:24-cv-00530

**Discovery Plan and Scheduling
Order Submitted in Compliance
with LR 26-1(b)**

23 On May 20, 2024, National Consumer Telecom & Utilities Exchange, Inc.
24 appeared in this case and the Court set a deadline to file a proposed discovery plan
25 and scheduling order by July 4, 2024. Accordingly, Anthony Williams and National
26 Consumer Telecom & Utilities Exchange, Inc. (collectively as the “Parties”), by and
27

1 through their respective counsel, hereby submit this Joint Discovery Plan and
 2 Scheduling Order. The parties will require 180 days of discovery measured from the
 3 date that National Consumer Telecom & Utilities Exchange, Inc. filed its answer to
 4 Plaintiff's complaint.
 5

6 **DISCOVERY PLAN**

7 The parties propose the following discovery plan and scheduling order:

- | | | |
|----|---|--------------------|
| 8 | 1. Initial disclosures | July 19, 2024 |
| 9 | 2. Amend pleadings and add parties .. | August 19, 2024 |
| 10 | 3. Expert disclosures (initial): | September 17, 2024 |
| 11 | 4. Expert disclosures (rebuttal): | October 17, 2024 |
| 12 | 5. Discovery cutoff date: | November 18, 2024 |
| 13 | 6. Dispositive motions: | December 18, 2024 |
| | 7. Pretrial order | January 17, 2025 |

14 In the event that dispositive motions are filed, the date for filing the joint
 15 pretrial order shall be suspended until **30 days after** decision on the dispositive
 16 motions or until further order of the court.
 17

18 Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any
 19 objections thereto, shall be included in the joint pretrial order.
 20

21 Extensions or Modifications of the Discovery Plan and Scheduling Order:
 22 Applications to extend any date set by the discovery plan, scheduling order, or other
 23 order must comply with the Local Rules.
 24

25 Protective Order: The parties may seek to enter a stipulated protective order
 26 pursuant to Rule 26(c) prior to producing any confidential documents.
 27

1 Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and
2 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be
3 served by sending such documents by email.
4

5 Alternative Dispute Resolution Certification: The parties certify that they met
6 and conferred about the possibility of using alternative dispute-resolution processes
7 including mediation, arbitration, and early neutral evaluation. The parties have not
8 reached any stipulations at this stage.
9

10 Alternative Forms of Case Disposition Certification: The parties certify that
11 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and
12 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
13 The parties have not reached any stipulations at this stage.
14

15 Electronically Stored Information: The parties have discussed the retention
16 and production of electronic data. The parties agree that service of discovery by
17 electronic means, including sending original electronic files by email or on a cd is
18 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.
19
20

21 Electronic evidence conference certification: The parties further intend to
22 present evidence in electronic format to jurors for the purposes of jury deliberations
23 at trial. The parties discussed the presentation of evidence for juror deliberations but
24 did not reach any stipulations as to the method as this early stage.
25

26 Dated: July 3, 2024.
27

FREEDOM LAW FIRM

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SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: July 8, 2024